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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Renee Okafuji,)	Case No. 2:22-cv-01802-AC
Plaintiff,)	STIPULATION AND PROPOSED
vs.)	ORDER FOR EXTENSION OF
Kilolo Kijakazi, Acting)	TIME
Commissioner of Social Security,)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from May 15, 2023 to July 14, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff Counsel has recently returned from a leave of absence and respectfully states that the

1 requested extension is necessary due several merit briefs being due on the same
2 week. For the weeks of May 8, 2023 and May 15, 2023, Counsel has 10 merit
3 briefs due. Additionally, Counsel will be attending the NOSSCR's Annual
4 Conference out of state in Washington D.C on May 3, 2023 to May 6, 2023, and
5 requires additional time to brief the issues thoroughly for the Court's
6 consideration. Defendant does not oppose the requested extension. Counsel
7 apologizes to the Defendant and Court for any inconvenience this may cause.

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9 Respectfully submitted,

10 Dated: May 1, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

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12 By: /s/ Dolly M. Trompeter
13 DOLLY M. TROMPETER
14 Attorneys for Plaintiff

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16 Dated: May 1, 2023

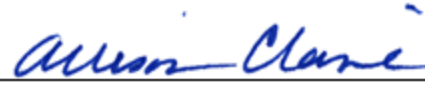
PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

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22 By: */s/ Geralyn Gulseth
23 Geralyn Gulseth
24 Special Assistant United States Attorney
25 Attorneys for Defendant
26 (*As authorized by email on May 1, 2023)
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PROPOSED ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: May 2, 2023



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE